

From: GROUP BATON-ROUGE-TAT
To: R6DAL01.R6TOXLAN (BLACK-BRENDA), R6DAL02.R6HAZRD1 (BR...
Date: Monday, September 9, 1996 11:30 am
Subject: CASTEX POLREP 3

POLREP NO: 3 (REMOVAL)

Date: 09/09/96
Subject: CASTEX SYSTEMS REMOVAL
From: Mike Ryan, OSC, U.S. EPA, Region 6, ERB (214/665-2270)
To: Director, ERD and Region 6
Charles A. Gazda, Chief, ERB, Region 6
Case Officer, Case Team 1, USCG NPFC
Commanding Officer, USCG-D8(m)
Commanding Officer, MLC-LANT Contracting Officer
Commanding Officer, USCG Gulf Strike Team
Louisiana Department of Environmental Quality (LDEQ)

Site ID#:	CERCLIS No: N/A
FPN No: 08-6-144	Delivery Order No: Awaiting MLC-LANT
Response Authority: OPA	ERNS No: N/A
NPL Status: N/A	Action Lead: FUND
State Notification: LDNR	Start Date: 8/19/96
Incident Category: Inactive Disposal Facility	Completion Date:
Action Memorandum Status: N/A	Event Qualifer: ER

I. SITUATION INFORMATION

A. Site description

The Castex System Site is a nonhazardous oil-field waste (NOW) disposal facility that was abandoned in 1989 shortly after a fire and catastrophic failure of the produced water storage tank battery. The site is located at Lat 30o 11' 10", Lon 92o 36' 55", approximately three miles east of Jennings, Jefferson Davis Parish, Louisiana. The facility is in a rural area and is situated adjacent to a marsh and one mile east of the Mermentau River.

B. Description of threat

Approximately 9700 barrels (bbls) of NOW fluids are contained in 19 above ground storage tanks (ASTs, varying in condition from fair to poor. The failed storage tanks contained naturally occurring radioactive material (NORM) sediments that were spilled into the containment basin and mixed with oily sludge. The containment basin has been breached on the south side and is releasing oily water and NORM sediments into the marsh. The marsh flows into the Mermentau River which flows through Grand Lake to the Gulf of Mexico. The facility also has eleven waste management units (WMUs) that contain approximately 20,400 bbls of oil-based material, 96,319 bbls of salt-base material, and 17,100 bbls of rainwater.

Chemicals of concern are barium, arsenic, benzene, crude oil waste,

90068549



and NORM.

C. Preliminary Assessment Results

Air monitoring around the ASTs and WMUs for volatile organic compounds (VOCs), percent oxygen and the lower explosive limit (LEL) indicated no readings significantly different from background. The soil in the primary containment basin has readings of 500 microroetgens/hour (uR/hr), according to a 1995 LDNR survey, which qualifies the material as NORM by Louisiana regulations.

D. Site History/Background

Historical actions taken: The Louisiana Department of Natural Resources (LDNR) permitted the facility to begin disposal of NOW material in September of 1982. The facility accepted oil and water based drilling mud, drill cuttings, produced saltwater, and oily water. Saltwater was injected into the saltwater disposal (SWD) well and solids were stockpiled in WMUs for treatment. The LDNR ordered the facility closed in August of 1989, based on violations of Statewide Order No. 29-B, by Administrative Order No. UIC 89-2.

The LDNR requested assistance from EPA Region 6 ERB in May of 1996.

II. SITE INFORMATION

A. Site Activities to Date

EPA, USCG-GST, the Basic Ordering Agreement (BOA) contractor Emtech Environmental Services, and START mobilized to the site and began clearing weeds and debris from the site, delineating WMUs and NORM areas. A quality assurance and sampling plan (QASP) was developed to determine disposal requirements. Eighteen composite soil samples and nine tank waste composite and grab samples were collected and submitted for analysis of TCLP Metals, Pesticides/PCBs, Reactivity (Cyanides and Sulfides), Corrosivity, Ignitability, Total Recoverable Petroleum Hydrocarbons (TRPH), Radium 226, and Radium 228. The EPA OSC met with the LDNR Mining and Injection Division (MID) and arranged to have the on-site SWD well (SN 034959) tested for potential produced water disposal. EPA is meeting with LDEQ and LDNR to determine various disposal options for other on-site NOW material.

B. Next Steps:

EPA will continue to coordinate with LDEQ and LDNR for SWD well usage and state removal requirements. A second BOA contractor, Holston's of Jennings, will mobilize to the site on 11 Sept, 1996, to perform pressure tests on SDW in preparation for on-site disposal activities. EPA is investigating a third BOA contractor to oversee safety and disposal protocol for NORM removal and disposal activities. The START will receive the fax/verbal results from the seventeen soil and nine waste sample analysis for TCLP Metals, Pesticides/PCBs, Reactivity (Cyanides and Sulfides), Corrosivity,

Ignitability, and TRPH by 13 Aug 1996. The fax/verbal results from the three soil and one waste sample analysis for Radium 226 and Radium 228 will be received by 20 Aug 1996. Hard copy results with all quality control parameters will follow verbal results by one week and START will begin data validation at that time.

C. Key Issues:

Deed and Title Search and Review is on-going to determine current status of PRPs for enforcement action and cost recovery through the fund center.

III. PROPOSED ACTIONS

Dispose of NOW liquids, preferably through use of on-site injection well (SN 034959). Excavation of NOW solids and disposal of same at a state permitted facility. Excavation of NORM contaminated material and disposal of same at a state permitted facility. Plug and abandon (P&A) the SWD well and restore site to grade.

IV. COST INFORMATION

As of COB on 8 September 1996.

FPN: \$	250,000.00		
	Ceiling	Cost to date	
Contractor (EMTECH):	\$ 125,000		
Personnel		\$	34,817.40
Equipment		\$	12,334.85
Material		\$	248.36
Sub-Contract		\$	437.69
Contractor Total:		\$	47,838.30
Contractor (Holston):	\$ 25,000		
Personnel		\$	0.00
Equipment		\$	0.00
Material		\$	0.00
Sub-Contract		\$	0.00
Contractor Total:		\$	0.00
Government:	\$ 100,000		
EPA		\$	3,965.00
USCG-GST		\$	10,989.40
START		\$	8,402.40
Government Total:		\$	23,356.80
SITE TOTAL:		\$	71,195.10

V. DISPOSITION OF WASTE

Not Applicable at this time.

Case Pends

OSC: Mike Ryan P.E.
START PM: Will Farrar